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Counsel for Defendant
Jizhong Chen

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES,

Plaintiff,

vs.

JIZHONG CHEN,

Defendant.

Case No. CR 19-00056 EJD

**STIPULATION AND [PROPOSED] ORDER
TO CONTINUE STATUS CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED between the Government, through Assistant United States Attorney Marissa Harris, and Defendant Jizhong Chen, through his attorney Daniel Olmos, that the status hearing in this matter be continued from July 19, 2021, to November 8, 2021.

This is a complex case with voluminous discovery, and the government has recently produced additional discovery which the defense needs additional time to review. Further, the defense anticipates initiating third party discovery in the coming months pursuant to Federal Rule of Criminal Procedure 17(c). When the parties were present at the previous status conference on May 17, 2021, they informed the Court that the Government had recently produced a substantial amount of digital discovery – comprising forensic images of numerous computers and other digital media – which the defense needs time to review.

1 The parties agree that the time between July 19, 2021, and November 8, 2021, should be
2 excluded from calculations under the Speedy Trial Act, which excludes delay when the interests of
3 justice in allowing for the effective preparation of the defense outweigh the best interest of the public
4 and the defendant in a speedy trial, taking into account the exercise of due diligence. 18 U.S.C. §§
5 3161(h)(7)(A) and (B)(iv).
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7 For the foregoing reasons, the parties stipulate to continue the status conference to November
8 8, 2021.

9 IT IS SO STIPULATED

10 Dated: July 9, 2021

NOLAN BARTON & OLMOS LLP

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12 /S/ Daniel B. Olmos

Daniel B. Olmos

13 Attorney for Defendant Jizhong Chen
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16 Dated: July 9, 2021

Stephanie Hinds, Acting United States Attorney

17 /S/ Marissa Harris

18 By: Marissa Harris

19 Assistant United States Attorney
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3 **UNITED STATES DISTRICT COURT**
4 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
5 **SAN JOSE DIVISION**
6

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8 UNITED STATES,

9 Plaintiff,

10 v.

11 JIZHONG CHEN,
12

13 Defendant.
14

Case No. CR 19-00056 EJD

**[PROPOSED] ORDER TO CONTINUE
STATUS CONFERENCE**

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16 GOOD CAUSE APPEARING, it is hereby ordered that the status conference currently
17 scheduled for July 19, 2021, be continued to November 8, 2021, at 1:30 p.m. Based upon the
18 representation of counsel and for good cause shown, the Court also finds that the time between July
19 19, 2021, through and including November 8, 2021, shall be excluded from calculations under the
20 Speedy Trial Act. The interests of justice in allowing for the effective preparation of the defense and
21 continuity of counsel outweigh the best interest of the public and the defendant in a speedy trial,
22 taking into account the exercise of due diligence. 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).
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24 Dated:

25 _____
The Hon. Edward J. Davila
26 United States District Judge
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